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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 CHANDRA BRIDGES,  
15 Defendant.

Case No. 2:21-cr-00041-ART-BNW

**UNOPPOSED MOTION TO**  
**AMEND CONDITIONS OF**  
**PRETRIAL RELEASE**

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17 Chandra Bridges, through her attorney of record, Nisha Brooks-Whittington, Assistant  
18 Federal Public Defender, files this Unopposed Motion to Amend Conditions of Pretrial Release  
19 under 18 U.S.C. § 3142(c)(3). This request stems from the following Memorandum of Points  
20 and Authorities.

21 DATED this 31st day of May, 2022.

22 RENE L. VALLADARES  
23 Federal Public Defender

24 By: /s/ Nisha Brooks-Whittington

25 NISHA BROOKS-WHITTINGTON  
Assistant Federal Public Defender  
26 Attorney for Chandra Bridges

## MEMORANDUM OF POINTS AND AUTHORITIES

In February 2021, the government filed an Indictment charging Ms. Bridges with false statement during purchase of a firearm in violation of 18 U.S.C. §§ 922(a)(6) and 924(a)(2). ECF No. 1. Ms. Bridges made her initial appearance and pled not guilty to the one count Indictment. ECF No. 4. The Magistrate Judge released Ms. Bridges on a personal recognizance bond with conditions. ECF Nos. 4, 6.

Ms. Bridges has remained out of custody pending resolution of her case since March 2021. She now seeks to amend two of her conditions. As stated in 18 U.S.C. § 3142(c)(3), “[t]he judicial officer may at any time amend the order to impose additional or different conditions of release.” The first condition Ms. Bridges seeks to amend is the employment condition. That condition currently reads: “The defendant shall maintain or actively seek lawful and verifiable employment and notify Pretrial Services or the supervising officer prior to any change.” ECF No. 6 at 4. Ms. Bridges is actively seeking employment but until she can obtain a job she would like to return to school. As a result, Ms. Bridges requests her conditions be modified to state: “The defendant shall maintain or actively seek lawful and verifiable employment and notify Pretrial Services or the supervising officer prior to any change AND/OR the defendant shall maintain or commence an education or vocational program as directed by Pretrial Services or the supervising officer.”

The second condition Ms. Bridges seeks to amend is with respect to “Other Conditions” which state: “The defendant shall avoid all contact directly or indirectly with any known felons or gang members without the prior approval of Pretrial Services. She may have contact with Jeffrey Norton Jr. and Kenneth Bridges.” ECF No. 6 at 5. Under this condition, Ms. Bridges was allowed to have contact with her father, Kenneth Bridges. Mr. Bridges has sadly passed away. Ms. Bridges request his name be removed from the conditions. Ms. Bridges further requests permission to have contact with Calvin Boyden III. Mr. Boyden is Ms. Bridges’ husband.

